

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

EVELYN WILLIAMS	:	
	:	
Plaintiff,	:	
	:	CASE NO. 3:20-cv-02594-JGC
v.	:	
	:	
BARTON MALOW CO., et al.	:	JUDGE JAMES G. CARR
	:	
Defendants.	:	

JOINT STATUS REPORT AND JOINT REQUEST TO POSTPONE
THE INITIAL SETTLEMENT CONFERENCE

Pursuant to the Court's November 14, 2022 Order, Defendant Barton Malow ("Defendant") and Plaintiff Evelyn Williams ("Plaintiff") hereby provide a joint status report and joint request to postpone the Initial Settlement Conference scheduled for April 3, 2023 at 1:00 p.m. in order to permit the Parties to conclude limited discovery in advance of the Initial Settlement Conference.

Since the Court's November 14, 2022 Order, the Parties have worked to conclude written discovery. Plaintiff is providing some final supplementation on damages the week of March 6, 2022. The Parties are also seeking to schedule and take Plaintiff's deposition and a corporate deposition of Defendant's representative. Due to counsel and client schedules, these depositions will not be held until later in March or early April. Counsel for the Parties jointly agree that these two depositions will greatly aid the parties in attempting to reach a settlement during the Initial Settlement Conference.

Based on the expected deposition schedule, the Parties jointly request that this Court schedule the Initial Settlement Conference for a date in May of 2023, and that they receive a corresponding extension of the time within which to exchange demand and offer letters. A

continuance of thirty days or more will aid the Parties in reaching a final resolution and it will not unduly delay this matter. Finally, this request is brought in good faith and is presented by counsel for all Parties. Accordingly, for good cause shown, this Court should postpone the Initial Settlement Conference. If this Court desires, counsel are available for a status conference to discuss a mutually convenient date for the Initial Settlement Conference.

Respectfully submitted,

/s/ Donald Screen

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